

<p><b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b></p>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 and Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p><b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467  <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>	<p><b>OTTERBOURG P.C.</b> Melanie L. Cyganowski, Esq. Richard G. Haddad, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. David A. Castleman, Esq. mcyganowski@otterbourg.com rhaddad@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com dcastleman@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104 <i>Proposed Co-Counsel for Official Committee of Talc Claimants</i></p>

In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

**LTL MANAGEMENT LLC,**

Plaintiff,

v.

**THOSE PARTIES LISTED ON  
APPENDIX A TO COMPLAINT  
AND JOHN AND JANE**

**DOES 1-1000,**  
Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

Adv. Pro. No. 23-01092 (MBK)

**CERTIFICATION FOR DIRECT APPEAL OF  
PRELIMINARY INJUNCTION ORDER OF APRIL 20, 2023  
TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

Upon consideration of the *Request of Official Committee of Talc Claimants for Order Certifying Direct Appeal of Preliminary Injunction Order of April 20, 2023 to the United States Court of Appeals for the Third Circuit* (the “Request”) filed by the Official Committee of Talc Claimants (“TCC”) for certification for direct appeal to the Third Circuit Court of Appeals (the “Third Circuit”) of TCC’s pending appeal (the “Appeal”) of (a) *the Order of April 20, 2023 granting in part the relief sought by Debtor’s Motion For An Order (I) Declaring That The Automatic Stay Applies Or Extends To Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, And (III) Granting A Temporary Restraining Order Ex Parte Pending A Hearing On A Preliminary Injunction*; (b) *the Order of the same date granting a preliminary*

---

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

*injunction prohibiting the commencement or continuation of any trial against any of the protected parties identified in Appendix B to the verified complaint in Adversary Case No. 23-01092 (MBK), as amended, through and including June 15, 2023; and (c) the Bench Order of the Court of the same date (Adversary Case No. 23-01092 (MBK)) (collectively, the “Order”), and all papers filed in support of and in opposition to the Request, and the oral argument on the Request held on April 27, 2023, and all prior proceedings herein, and finding good cause for the requested certification; and upon due consideration, the Court hereby finds as follows:*

1. the Order involves matters of public importance requiring certification for direct appeal to the Third Circuit;
2. the Order involves questions of law for which there is no controlling decision of the Third Circuit or the United States Supreme Court; and
3. an immediate appeal from the Order may materially advance the progress of this case or these proceedings.

Based on the foregoing, and for good cause shown:

**IT IS HEREBY ORDERED** that, pursuant to 28 U.S.C. § 158(d)(2) and Rule 8006 of the Federal Rules of Bankruptcy Procedure, TCC’s Appeals of the Order is hereby certified for direct appeal to the United States Court of Appeals for the Third Circuit.

Dated: \_\_\_\_\_, 2023

---

HONORABLE MICHAEL B. KAPLAN  
UNITED STATES BANKRUPTCY JUDGE